

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 21-10 DWF/ECW

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2251(a)

v.

18 U.S.C. § 2251(e)

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(b)(2)

RUSSELL JAMES ANDERSON-BALDWIN,

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Production of Child Pornography)

On or about December 24, 2019, in the State and District of Minnesota, the defendant,

**RUSSELL JAMES ANDERSON-BALDWIN,**

did employ, use, persuade, entice, and coerce, a known Minor Victim to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, including the following digital video:

File Name	Description
20191224_234259.mp4	The defendant videoed the Minor Victim fully nude, inserting a hairbrush into her anus. The video also depicts the Minor Victim with blue underwear in her mouth, with her vagina and breasts fully exposed.

which visual depictions were produced using materials, including a Motorola Moto E5 smartphone, that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



**COUNT 2****(Production of Child Pornography)**

On or about January 20, 2020, in the State and District of Minnesota, the defendant,

**RUSSELL JAMES ANDERSON-BALDWIN,**

having been previously convicted under the law of the State of Minnesota relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely a conviction on or about January 16, 2020, in Isanti County, Minnesota, for Possession of Pornographic Work Involving Minors, did employ, use, persuade, entice, and coerce, a known Minor Victim to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, including the following digital video:

<b>File Name</b>	<b>Description</b>
20200120_035933.mp4	A video depicting the Minor Victim inserting a brush handle in and out of her vagina for approximately eight seconds.

which visual depiction was produced using materials, including a Motorola Moto E5 smartphone, that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT 3****(Possession of Child Pornography)**

On or about August 10, 2020, in the State and District of Minnesota, the defendant,

**RUSSELL JAMES ANDERSON-BALDWIN,**

having been previously convicted under the law of the State of Minnesota relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely a conviction on or about January 16, 2020, in Isanti County,

Minnesota, for Possession of Pornographic Work Involving Minors, did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer image files:

- a) thumbdata4\_embedded\_1127.jpg – an image file depicting a pre-pubescent girl approximately 5-8 years old. The minor victim's vagina is exposed while an adult male is holding his erect penis directly over her body.
- b) thumbdata4\_embedded\_1158.jpg - an image file depicting two naked, pre-pubescent girls approximately 5-8 years old whose vaginas are exposed.
- c) thumbdata4\_embedded\_1193.jpg – an image file depicting an adult male inserting his penis into the vagina of a girl approximately 3-5 years old.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

### **FORFEITURE ALLEGATIONS**

Counts 1 through 3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

**RUSSELL JAMES ANDERSON-BALDWIN,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical,

film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to a Motorola Moto E5 smart phone, model XT1921-8, IMEI: 359543093522809.

If the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 18 U.S.C. § 2251(a), 2252(a)(4)(B), 2252(b)(2), and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON